

*September 17, 2020*

David J. Bradley, Clerk of Court

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**UNITED STATES OF AMERICA**

**V.**

**WILLIAM DEXTER LUCAS**

**a.k.a. Bill Lucas**

**DEBORAH JEAN LUCAS**

**BRIAN MICHAEL CORPIAN**

§  
§  
§  
§  
§  
§  
§  
§

**CRIMINAL NO.**

**4:20-cr-452**

**INDICTMENT**

**COUNT ONE**

**(Conspiracy to Commit Bank and Wire Fraud - 18 U.S.C. § 1349)**

At all times material to this Indictment:

**I. INTRODUCTION**

**A. The Paycheck Protection Program**

1. In response to the coronavirus (COVID-19) pandemic and economic crisis, Congress passed the Coronavirus Aid, Relief, and Economic Security (CARES) Act. The law was designed to provide emergency financial assistance to the millions of Americans who are suffering the economic effects caused by the COVID-19 pandemic. The Act was signed into law on March 27, 2020, and included the Paycheck Protection Program which was implemented by the

United States Small Business Administration (“SBA”) with support from the United States Department of Treasury.

2. The SBA is a federal agency of the Executive Branch that administers assistance to American small businesses. This assistance includes guaranteeing loans that are issued by certain lenders to qualifying small businesses. Under the SBA loan guarantee programs, the actual loan is issued by a commercial lender, but the lender receives the full faith and credit backing of the United States Government on a percentage of the loan. Therefore, if a borrower defaults on an SBA guaranteed loan, the commercial lender may seek reimbursement from the SBA, up to the percentage of the guarantee. By reducing the risk to commercial lenders, the SBA loan guarantee programs enable lenders to provide loans to qualifying small businesses when financing is otherwise unavailable to them on reasonable terms through normal lending channels. When a borrower seeks an SBA - guaranteed loan, the borrower must meet both the commercial lender’s eligibility requirements for the loan as well as the SBA’s eligibility requirements.

3. One source of relief provided by the CARES Act was the authorization of up to \$349 billion in forgivable loans to small businesses for job retention and certain other expenses through the Paycheck Protection Program (the “PPP”). The PPP provided for government guaranteed loans which were designed

to provide a direct incentive for small businesses to keep their workers on the payroll by providing small businesses with funds to pay up to 8 weeks of payroll costs, including benefits. On April 24, 2020, the Paycheck Protection Program and Health Care Enhancement Act was signed into law, authorizing over \$300 billion in additional PPP funding. On June 5, 2020, the Paycheck Protection Program Flexibility Act (“PPPFA”) was signed into law, amending certain terms of the PPP.

4. The PPP allowed qualifying small businesses and other organizations to receive unsecured SBA guaranteed loans with a maturity of two years and an interest rate of one percent. PPP loan proceeds must be used by businesses on payroll costs, mortgage interest, rent, and/or utilities. The PPP allowed the interest and principal to be forgiven if businesses spend the proceeds on these expenses within eight weeks of receipt and use at least 75% of the forgiven amount for payroll. Pursuant to the CARES Act, the amount of PPP funds a business was eligible to receive was determined by the number of employees employed by the business and their average payroll costs. The maximum loan amount was generally limited to 2.5 times the business’s average monthly payroll expenses. Businesses applying for a PPP loan must provide documentation to confirm that they have in the past paid employees the compensation represented in the loan

application. Eligible businesses must have been in operation on or before February 15, 2020, and either had paid employees or independent contractors.

5. The SBA will forgive PPP loans if all employees are kept on the payroll for eight weeks and the money was used for payroll, rent, mortgage interest, or utilities. The available funds were meant to help workers by keeping them employed.

6. Small businesses could apply for a PPP loan through any federally insured depository institution or other approved lenders who receive and process PPP applications and supporting documentation, and then make loans using the lenders' own funds.

The Federal Deposit Insurance Corporation (FDIC) is an agency of the federal government which insures the deposits of member banks against loss with the purpose of preventing their collapse and instilling public confidence in the nation's banking institutions. Allegiance Bank is a financial institution the deposits of which were insured by the FDIC.

7. Faith-based organizations were eligible to receive SBA loans under the PPP. Churches and other houses of worship qualified for PPP loans as long as they met the requirements of Section 501(c)(3) of the Internal Revenue Code,

and all other PPP requirements. Such organizations were not required to apply to the IRS to receive tax-exempt status.

Section 501(c)(3) of the Internal Revenue Code, found at Title 26, United States Code, Section 501(c)(3), identifies certain corporations which may be designated as tax exempt by the Internal Revenue Service (IRS) under specific circumstances. Organizations described in Section 501(c)(3) are commonly referred to as charitable organizations. To be tax-exempt under Section 501(c)(3) of Title 26, an organization must be organized and operated exclusively for exempt purposes as described in 501(c)(3), and none of its earnings may inure to any private shareholder or individual.

**B. Jesus Survives Ministries, Inc.**

8. Jesus Survives Ministries is registered as a Texas corporation, whose Articles of Incorporation were filed on or about March 31, 2020. Article 4 of the Articles of Incorporation stated that Jesus Survives Ministries, Inc. was organized for non-profit purposes, that is, to establish and maintain a church. The Articles also stated that the officers of the corporation were the Lead Pastor and members of the Pastoral Leadership Team. WILLIAM DEXTER LUCAS was named the President of Jesus Survives Ministries, Inc. and the Vice President and Secretary of Jesus Survives Ministries, Inc. was BRIAN MICHAEL CORPIAN.

WILLIAM DEXTER LUCAS held himself out as the Lead Pastor of Jesus Survives Ministries. BRIAN MICHAEL CORPIAN also identified himself as a Pastor and Ministry Director. DEBORAH JEAN LUCAS (who is married to WILLIAM DEXTER LUCAS) also represented that she was a Pastor at Jesus Survives Ministries.

9. DEBORAH JEAN LUCAS was named as the new Registered Agent of Jesus Survives Ministries, Inc. on or about May 5, 2020. This change was executed by WILLIAM DEXTER LUCAS. The registered office was transferred from the residential property located at 7036 Dairy Ashford, Houston, Texas to the residential property located at 20134 Larkspur Landing, Richmond, Texas.

## II. THE SCHEME

10. The purpose of the scheme was to fraudulently obtain loan proceeds from Allegiance Bank which had been made available by the United States Congress as part of the CARES Act. It was a further goal of the scheme to convince Allegiance Bank and the SBA that the proceeds from the loan were utilized as contemplated by the CARES Act and therefore the loan should be forgiven by the SBA.

## III. MANNER AND MEANS OF THE SCHEME

It was part of the scheme that:

11. WILLIAM DEXTER LUCAS made false certifications in his application for a PPP loan in the name Jesus Survives Ministries, Inc. submitted to Allegiance Bank and the Small Business Administration.

12. WILLIAM DEXTER LUCAS, DEBORAH JEAN LUCAS and BRIAN MICHAEL CORPIAN participated in preparing and submitting falsified documents in support of an application for a PPP loan in the name of Jesus Survives Ministries, Inc.

13. WILLIAM DEXTER LUCAS, DEBORAH JEAN LUCAS and BRIAN MICHAEL CORPIAN prepared and submitted documents designed to give the appearance to Allegiance Bank that Jesus Survives Ministries, was and had been, a solvent and thriving religious organization, including the submission of financials allegedly audited by a CPA.

14. WILLIAM DEXTER LUCAS, DEBORAH JEAN LUCAS and BRIAN MICHAEL CORPIAN prepared and submitted documents to Allegiance Bank designed to convince the bank that Jesus Survives Ministries, Inc. was an employer, making payroll and withholding taxes from its employees' wages, including the submission of false Employer's Quarterly Federal Tax Return forms 941 and alleged payroll records for Jesus Survives Ministries.

15. WILLIAM DEXTER LUCAS, DEBORAH JEAN LUCAS and BRIAN MICHAEL CORPIAN prepared and submitted documents to substantiate that the residence located at 20134 Larkspur Landing, Richmond, Texas was leased for Jesus Survives Ministries including a lease agreement, as well as an altered TXU Energy bill for that address which falsely reflected the account holder was Jesus Survives Ministries.

16. WILLIAM DEXTER LUCAS and BRIAN MICHAEL CORPIAN sent accusatory and intimidating emails to a banker at Allegiance Bank who was reviewing their PPP loan submissions, regarding the bank's alleged failure to review and fund the loan quickly.

#### IV. THE CONSPIRACY

17. From in or about March 2020 and continuing through on or about, May 19, 2020, in the Southern District of Texas and elsewhere, the defendants

WILLIAM DEXTER LUCAS  
a.k.a. Bill Lucas  
DEBORAH JEAN LUCAS  
BRIAN MICHAEL CORPIAN

and others known and unknown to the grand jury, did knowingly conspire and agree with one another to commit the following offenses against the United States:

a. To knowingly execute and attempt to execute a scheme and



artifice to defraud a financial institution the accounts of which were insured by the Federal Deposit Insurance Corporation (FDIC), and to obtain money, funds, and property under the custody and control of the financial institution, by means of false and fraudulent pretenses, representations, and promises in violation of Title 18, United States Code, Section 1344.

b. To knowingly devise and intend to devise a scheme and artifice to defraud, and for obtaining money by means of materially false and fraudulent pretenses, representations, and promises, and to knowingly use and cause to be used interstate wire communications facilities in carrying out the scheme to defraud, in violation of Title 18, United States Code, Section 1343.

All in violation of Title 18, United States Code, Section 1349.

V. ACTS IN FURTHERANCE OF THE SCHEME

The following acts among others occurred in the Southern District of Texas and elsewhere during the period of the scheme to defraud on or about the following dates:

1.) March 31, 2020, WILLIAM DEXTER LUCAS and BRIAN MICHAEL CORPIAN caused Jesus Survives Ministries, Inc. to be registered with the Texas Secretary of State as a domestic nonprofit corporation.

2.) April 1, 2020, WILLIAM DEXTER LUCAS and BRIAN MICHAEL

CORPIAN caused a Texas Franchise Tax Account to be established in the name of Jesus Survives Ministries.

3.) April 6, 2020, WILLIAM DEXTER LUCAS and BRIAN MICHAEL CORPIAN caused to be submitted through Allegiance Bank, a loan application for a PPP guaranteed loan for Jesus Survives Ministries, Inc. for the stated purpose of payroll, lease payments, utilities and miscellaneous operating expenses.

4.) April 6, 2020, WILLIAM DEXTER LUCAS, in the loan application, certified that Jesus Survives Ministries was in operation on February 15, 2020, and had employees for whom it paid salaries and payroll taxes or paid independent contractors, as reported on Form(s) 1099-MISC.

5.) April 6, 2020, WILLIAM DEXTER LUCAS certified the information provided in the loan application and the information in the supporting documents and forms was true and accurate in all material respects.

6.) April 6, 2020, WILLIAM DEXTER LUCAS, DEBORAH JEAN LUCAS and BRIAN MICHAEL CORPIAN caused to be submitted to Allegiance Bank in support of their PPP loan application, a letter from the IRS which had been altered to make it appear that IRS had assigned Employer Identification Number, xx-xxx4065 to Jesus Survives Ministries in 2015.

7.) April 6, 2020, WILLIAM DEXTER LUCAS, DEBORAH JEAN

LUCAS and BRIAN MICHAEL CORPIAN caused a copy of a Texas Commercial Lease Agreement between CORPIAN as landlord and William LUCAS on behalf of Jesus Survives Ministries, Inc. and Deborah J. LUCAS as tenants to be submitted to Allegiance Bank in support of the PPP loan application.

8.) April 6, 2020, WILLIAM DEXTER LUCAS caused to be submitted to Allegiance Bank a copy of Department of Homeland Security Form I-9, Employment Eligibility Verification from employer Jesus Survives Ministries for WILLIAM D. LUCAS which was dated May 15, 2012.

9.) April 6, 2020, MICHAEL CORPIAN caused to be submitted to Allegiance Bank a copy of Department of Homeland Security Form I-9, Employment Eligibility Verification from employer Jesus Survives Ministries for BRIAN M. CORPIAN which was dated May 15, 2012.

10.) April 6, 2020, DEBORAH JEAN LUCAS caused to be submitted to Allegiance Bank a copy of Department of Homeland Security Form I-9, Employment Eligibility Verification from employer Jesus Survives Ministries for DEBORAH J. LUCAS which was dated May 12, 2012.

11.) April 6, 2020, WILLIAM DEXTER LUCAS caused to be submitted to Allegiance Bank in support of a PPP loan application, a TXU Energy bill for account xxxxxxxx3693 which had been altered to make it appear the customer name on TXU

account xxxxxxxx3693 was Jesus Survives Ministries.

12.) April 8, 2020, WILLIAM DEXTER LUCAS sent an email to Allegiance Bank threatening to sue the bank, in response to an email from Allegiance Bank indicating there were longer than normal wait times to process his request for a PPP loan.

13.) April 14, 2020, WILLIAM DEXTER LUCAS at 6:04 pm caused an email to be sent from email account twl@jesussurvives.com to Allegiance banker, B.T., asking for an update on the PPP loan application.

14.) April 14, 2020, WILLIAM DEXTER LUCAS at 10:31 pm caused an email to be sent from twl@jesussurvives.com in reply to Allegiance banker, B.T., stating “at the current rate the government funding will be exhausted by the end of this week.”

15.) April 17, 2020, WILLIAM DEXTER LUCAS at 1:53 pm caused an email to be sent to Allegiance banker, B.T., stating “Sir, I recommended two different businesses to your bank. One has already been funded and the other received notice last night that their loan has gone to funding. I have been in your que [sic] over a week longer than both of those businesses, yet I have not even been contacted yet by a loan officer? Please tell me why I should not be highly nervous? Pastor William Lucas Sr. Pastor Jesus Survives Ministries, Inc.”

16.) April 17, 2020, WILLIAM DEXTER LUCAS at 2:05 pm caused an email to be sent from twl@jesussurvives.com to Allegiance banker, B.T., which included the following: “It sounds like your bank has been telling you some whoppers. I could explain to you why some banks are doing so, but I would rather help you by showing you home [sic] to make that bank pay for their treachery.”

17.) April 17, 2020, WILLIAM DEXTER LUCAS at 2:11 pm caused an email to be sent to Allegiance banker, B.T., which stated “You want to go quiet now? Fine. This means war!”

18.) April 17, 2020, WILLIAM DEXTER LUCAS and BRIAN MICHAEL CORPIAN at 2:17 pm caused an email to be sent to Allegiance banker, B.T., stating “Why did you lie to me? Why? What did I do to you?”

19.) April 17, 2020, WILLIAM DEXTER LUCAS at 2:42 pm caused an email to be sent to Allegiance banker, B.T., which included a photograph of B.T.’s family, indicating to B.T. that he knew the names of B.T.’s wife and son.

20.) April 17, 2020, WILLIAM DEXTER LUCAS and BRIAN MICHAEL CORPIAN at 3:43 pm caused an email to be sent to Allegiance banker, B.T., stating “I want to know why you lied to me?”

21.) April 19, 2020, WILLIAM DEXTER LUCAS, DEBORAH JEAN LUCAS and BRIAN MICHAEL CORPIAN caused pay records from Jesus Survives

Ministries in the names DEBORAH J. LUCAS and WILLIAM LUCAS to be submitted to Allegiance Bank in support of the PPP loan application.

22.) April 19, 2020, WILLIAM DEXTER LUCAS, DEBORAH JEAN LUCAS and BRIAN MICHAEL CORPIAN caused a 2020 Employer's Quarterly Federal Tax Return Form 941 and four 2019 Employer's Quarterly Federal Tax Return Forms 941 in the name of Jesus Survives Ministries, using EIN xx-xxx4065 to be submitted to Allegiance Bank in support of the PPP loan application.

23.) April 19, 2020, WILLIAM DEXTER LUCAS, DEBORAH JEAN LUCAS and BRIAN MICHAEL CORPIAN caused to be provided to Allegiance Bank in support of a PPP loan, a document titled "2019 Annual Audit Report for Jesus Survives Ministries" which purported to be authored by a CPA.

24.) April 19, 2020, WILLIAM DEXTER LUCAS, DEBORAH JEAN LUCAS and BRIAN MICHAEL CORPIAN caused to be provided to Allegiance Bank in support of a PPP loan, a document which was purported to be a Profit and Loss Statement for Jesus Survives Ministries.

25.) April 19, 2020, WILLIAM DEXTER LUCAS, DEBORAH JEAN LUCAS and BRIAN MICHAEL CORPIAN caused to be provided to Allegiance Bank in support of a PPP loan, a document which was purported to be the General Ledger Reconciliation-Payroll for Jesus Survives Ministries showing transfers from

Wells Fargo account xxxx-7379 for payroll for the 2019 calendar year.

26.) April 23, 2020, WILLIAM DEXTER LUCAS caused bank account xxxxxxxx3431 to be opened at Bank of America in the name Jesus Survives Ministries, Inc. using EIN xx-xxx4065.

27.) April 24, 2020, WILLIAM DEXTER LUCAS and BRIAN MICHAEL CORPIAN caused a wire transfer of \$50,000 to be deposited into Jesus Survives Ministries, Inc. Bank of America account xxxxxxxx3431 from the Allegiance Bank Loan Department as PPP loan funding.

28.) May 1, 2020, DEBORAH JEAN LUCAS caused a cashier's check to be purchased from Bank of America payable to Jesus Survives Ministries in the amount of \$49,985.00, with funds held in account xxxxxxxx3431.

29.) May 5, 2020, WILLIAM DEXTER LUCAS made a notarized statement, that he would like to add Deborah Jean Lucas onto the business titled Jesus Survives Ministries at Woodforest National Bank account xxxxxx1596.

30.) May 5, 2020, DEBORAH JEAN LUCAS certified that she was the Secretary of Jesus Survives Ministries, Federal Employer I.D. Number xx-xxx4065.

31.) May 5, 2020, DEBORAH JEAN LUCAS opened a business checking account in the name Jesus Survives Ministries at Woodforest National Bank, account xxxxxx1596, using Tax identification Number xx-xxx4065.

32.) May 5, 2020, DEBORAH JEAN LUCAS opened a debit card, Master Card xxxxxxxxxxxx7337, at Woodforest National Bank.

33.) May 5, 2020, DEBORAH JEAN LUCAS deposited Bank of America cashier's check 1301617369 payable to Jesus Survives Ministries Inc. in the amount of \$49,985 into Jesus Survives Ministries account xxxxxx1596 at Woodforest National Bank.

34.) May 5, 2020, DEBORAH JEAN LUCAS opened a personal checking account at Woodforest National Bank, account xxxxxx5860.

35.) May 8, 2020, DEBORAH JEAN LUCAS opened a debit card, Master Card xxxxxxxxxxxx2351, at Woodforest National Bank.

36.) May 11, 2020, DEBORAH JEAN LUCAS caused \$1,388 to be transferred from Jesus Survives Ministries Woodforest National Bank business account xxxxxx1596, to her personal account, xxxxxx5860, at Woodforest National Bank.

VI. THE EXECUTION OF THE SCHEME

**COUNTS TWO THROUGH FIVE  
(False Statement to a Bank, 18 U.S.C. § 1014)**

A. The Grand Jury re-alleges and incorporates by reference, as though fully set forth herein, the allegations contained in section I through section III as set



out in Count One of the indictment.

B. On or about the following dates, in the Southern District of Texas and elsewhere, the defendants,

WILLIAM DEXTER LUCAS  
a.k.a. Bill Lucas  
DEBORAH JEAN LUCAS, and  
BRIAN MICHAEL CORPIAN

aided and abetted by each other and others known and unknown to the grand jury, did knowingly make a false statement for the purpose of influencing the action of Allegiance Bank, an FDIC insured institution in connection with the application for and funding of a Paycheck Protection Program loan to Jesus Survives Ministries, Inc. as set out below:

COUNT	DATE	TRANSACTION DESCRIPTION
2	April 6, 2020	Electronic submission to Allegiance Bank of Department of Homeland Security Forms I-9, Employment Eligibility Verifications, from employer Jesus Survives Ministries.
3	April 6, 2020	Electronic submission to Allegiance Bank of a letter from the IRS dated 8/18/2015 which had been altered to make it appear that Jesus Survives Ministries had been assigned Employer Identification Number xx-xxx4065.
4	April 19, 2020	Email submission to Allegiance Bank of Intuit Online Payroll records and Jesus Survives Ministries Employer's Quarterly Federal Tax Return Forms 941 for the 1 <sup>st</sup> through 4 <sup>th</sup> quarters of the 2019 tax year and quarter 1 of the 2020 tax year.

COUNT	DATE	TRANSACTION DESCRIPTION
5	April 19, 2020	Email submission to Allegiance Bank of financials of Jesus Survives Ministries for years 2019 and 2020.

All in violation of Title 18, United States Code, Sections 1014 and 2.

**COUNTS SIX THROUGH NINE**  
**(Wire Fraud, 18 U.S.C. § 1343)**

A. The Grand Jury re-alleges and incorporates by reference, as though fully set forth herein, the allegations contained in section I through section III as set out in Count One of the indictment.

B. On or about the dates listed below, in the Southern District of Texas, for the purpose of executing the above-described scheme to defraud and to obtain money by materially false and fraudulent pretenses, representations, and promises, and attempting to do so, the defendants,

WILLIAM DEXTER LUCAS  
a.k.a. Bill Lucas  
DEBORAH JEAN LUCAS, and  
BRIAN MICHAEL CORPIAN

did knowingly transmit and caused to be transmitted by means of wire communication in and affecting interstate commerce, the writings, signals, and sounds described below:

COUNT	DATE	WIRE COMMUNICATION
6	4/19/2020	Email from twl@jesussurvives.com to Allegiance banker B.T. with attachments Intuit Payroll records and Jesus Survives Ministries Employer Quarterly Tax Return Forms 941.
7	4/19/2020	Email from twl@jesussurvives.com to Allegiance banker B.T. with attachments of the Jesus Survives Ministries Articles of Incorporation, a Certificate of Filing of Jesus Survives Ministries with the Texas Secretary of State, and a Certificate of Filing of Jesus Survives Ministries Assumed Name with the Texas Secretary of State
8	4/19/2020	Email from twl@jesussurvives.com to Allegiance banker B.T. with attachments 2019 Annual Audit Report for Jesus Survives Ministries; Profit and Loss Statement; General Ledger Reconciliation – Main Financial Account; General Ledger Reconciliation – Credit Card Donations; General Ledger Reconciliation – Cash Donations; General Ledger Reconciliation – Wedding Services Revenue; General Ledger Reconciliation – Funeral Services Revenue; General Ledger Reconciliation – Pastoral Services; General Ledger Reconciliation – God’s Mercy; General Ledger Reconciliation – Web Marketing & Development Costs; General Ledger Reconciliation – Payroll; General Ledger Reconciliation – Reconciliation; General Ledger Reconciliation – Accrual Account; Letter from CPA regarding Internal Audit for Fiscal Year 2019.
9	4/24/2020	Wire transfer of \$50,000 in loan proceeds from Allegiance Bank to Bank of America account xxxxxxxx3431

In violation of 18, United States Code, Section 1343

**NOTICE OF CRIMINAL FORFEITURE**  
(18 U.S.C. §981(a)(1)(C); 28 U.S.C. §2461(c))

Pursuant to Title 18, United States Code, Section 981(a)(1)(C), the United States gives notice to the Defendants,

WILLIAM DEXTER LUCAS  
a.k.a. Bill Lucas  
DEBORAH JEAN LUCAS  
BRIAN MICHAEL CORPIAN

That upon conviction an offense charged in Counts 1 - 9, the United States will seek forfeiture of all property, real or personal, which constitutes or is derived from proceeds traceable to such offenses.

**Property Subject to Forfeiture**

The property subject to forfeiture includes, but is not limited to, the following:

1. \$46,285.22 seized on or about May 19, 2020, from a Woodforest National Bank account with an account number ending in 1596, held in the name of Jesus Survives Ministries.
2. \$392.24 seized on or about May 19, 2020, from a Woodforest National Bank account with an account number ending in 5860, held in the name of Deborah Jean Lucas.

**Money Judgment and Substitute Assets**

The United States gives notice that it will seek a money judgment against each Defendant. In the event that one or more conditions listed in Title 21, United States Code, Section 853(p) exist, the United States will seek to forfeit any other property of the Defendants up to the amount of the money judgment.

A TRUE BILL:

Signature on file

---

FOREPERSON OF THE GRAND JURY

RYAN K. PATRICK  
UNITED STATES ATTORNEY

By: Melissa J. Annis  
Melissa J. Annis